

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**DAVID A. JOFFE,**

**Plaintiff,**

**vs.**

**KING & SPALDING LLP,**

**Defendant.**

Case No. 17-cv-3392 (VEC)

**REPLY DECLARATION OF  
ANDREW M. MOSKOWITZ**

**ANDREW M. MOSKOWITZ** declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney admitted to practice law in this court and am Of Counsel to Javerbaum Wurgaft Hicks Kahn Wikstrom & Sinins (“JW”), withdrawing attorneys for Plaintiff David A. Joffe (“Mr. Joffe” or “Plaintiff”) in the above matter.

2. On June 4, 2018, I called and spoke with counsel for Defendant King & Spalding LLP (“KW”), Joseph Baumgarten, Esq. Attached as Exhibit A is an excerpt from my time records for June 4, 2018. As reflected therein, my entry for June 4, 2018 states, “meeting with client; phone calls with client; phone call with expert []; phone call with opposing counsel.” (emphasis added).

3. During our phone call, I informed Mr. Baumgarten that Plaintiff’s settlement demand was [REDACTED]. I also stated that the non-monetary component of Plaintiff’s demand would require KW to adopt an ethics program. I further stated that we

would request that the Court retain jurisdiction over the case to ensure that KW adhered to this requirement.

4. Attached are true and correct copies of the following documents:

<b>Exhibit</b>	<b>Description</b>
B	Emails between David Joffe and Andrew Moskowitz dated February 19, 2018
C	Emails between David Joffe and Andrew Moskowitz dated February 25, 2017
D	Emails between David Joffe and Andrew Moskowitz dated April 19, 2017
E	Email from David Joffe to Andrew Moskowitz dated May 5, 2017
F	Email from David Joffe to Andrew Moskowitz dated June 15, 2017
G	Emails between David Joffe and Andrew Moskowitz dated June 21, 2017
H	Email from David Joffe and Andrew Moskowitz dated July 28, 2017
I	Email from David Joffe to Andrew Moskowitz dated July 8, 2017
J	Emails between David Joffe and Andrew Moskowitz dated January 7, 2018
K	Emails between David Joffe and Andrew Moskowitz dated July 10, 2018
L	Emails between David Joffe and Andrew Moskowitz dated November 9, 2017
M	Email from David Joffe to Andrew Moskowitz dated December 15, 2017

Dated: August 6, 2018

/s/ Andrew Moskowitz  
Andrew Moskowitz